

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

: INFORMATION

- v. -

JOANNE SIMMONS,

: 12 Cr. 12 CRIM 652

Defendant.

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:

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COUNT ONE

The United States Attorney charges:

1. From in or about 2004 through in or about 2012, in the Southern District of New York and elsewhere, JOANNE SIMMONS, the defendant, knowingly and with intent to defraud did make a false statement to the United States Department of Housing and Urban Development, to wit, SIMMONS falsely reported her principal residence to obtain more than \$120,000 in federal housing subsidies from the United States Department of Housing and Urban Development.

(Title 18, United States Code, Section 1012.)



PREET BHARARA
United States Attorney

USDC SDNY
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